

Case: 30C11-22-cv-00110-KJ Document #: 1 Filed: 06/09/2022 Page 1 of 5

COVER SHEET		Court Identification Docket #		Case Year	Docket Number
Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading)		<div style="border: 1px solid black; padding: 2px; display: inline-block;">30</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">19</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">CI</div>	<div style="border: 1px solid black; padding: 2px; display: inline-block;">20</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">22</div>	<div style="border: 1px solid black; padding: 2px; display: inline-block;">00</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">110</div>	<div style="border: 1px solid black; padding: 2px; display: inline-block;"></div> <div style="border: 1px solid black; padding: 2px; display: inline-block;"></div> <div style="border: 1px solid black; padding: 2px; display: inline-block;"></div>
		County # Judicial District Court ID (CH, CI, CO)			
		<div style="border: 1px solid black; padding: 2px; display: inline-block;">06</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">09</div> <div style="border: 1px solid black; padding: 2px; display: inline-block;">22</div>			
		Month Date Year			
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2020)		This area to be completed by clerk	
In the <u>CIRCUIT</u>		Court of <u>JACKSON</u>	County <u>—</u>	Judicial District <u>—</u>	
Origin of Suit (Place an "X" in one box only) <input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal					
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form					
Individual <u>Defendants</u> <u>Kelia</u> <div style="display: flex; justify-content: space-between;"> Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV </div> <input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ <input type="checkbox"/> Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
Business Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____					
Address of Plaintiff <u>6111-A Dora Ave. Moss Point, MS 39563</u>					
Attorney (Name & Address) <u>J. Heath Sullivan - 1423 24th Avenue, Gulfport, MS 39501</u> MS Bar No. <u>105226</u> <input type="checkbox"/> Check (x) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing: _____					
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form					
Individual <div style="display: flex; justify-content: space-between;"> Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV </div> <input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ <input type="checkbox"/> Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
Business <u>Sun Coast Resources, Inc. - incorporated in Texas</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated <input type="checkbox"/> Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____					
Attorney (Name & Address) - If Known MS Bar No. _____					
<input type="checkbox"/> Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet					
Nature of Suit (Place an "X" in one box only)					
Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Term. of Parental Rights-Chancery <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____	Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____	<input type="checkbox"/> Alcohol/Drug Commitment (Voluntary) <input type="checkbox"/> Other _____	Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____		
Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Municipal Court <input type="checkbox"/> Other _____	Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Mental Health Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Joint Conservatorship & Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Alcohol/Drug Commitment	Children/Minors - Non-Domestic <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion <input type="checkbox"/> Minor Removal of Minority <input type="checkbox"/> Other _____	Torts <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Intentional Tort <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input checked="" type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____		
Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____					

EXHIBIT

A

tabbies

Case: 30CI1:22-cv-00110-KJ Document #: 1 Filed: 06/09/2022 Page 2 of 5

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

JUDICIAL DISTRICT, CITY OF

Docket No. -
File Yr Chronological No. Clerk's Local IDDocket No. If Filed
Prior to 1/1/94PLAINTIFFS IN REFERENCED CAUSE - Page 1 of ___ Plaintiffs Pages
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff #2:

Individual: Roberson Carlos (M) Jr/Sr/III/IV
Last Name First Name Maiden Name, if Applicable Middle Init.

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of

Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A

Business Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A

ATTORNEY FOR THIS PLAINTIFF: Bar # or Name: J. Heath Sullivan Pro Hac Vice (✓) Not an Attorney(✓)

Plaintiff #3:

Individual: Last Name First Name (M) Jr/Sr/III/IV
Last Name First Name Maiden Name, if Applicable Middle Init.

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of

Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A

Business Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A

ATTORNEY FOR THIS PLAINTIFF: Bar # or Name: Pro Hac Vice (✓) Not an Attorney(✓)

Plaintiff #4:

Individual: Last Name First Name (M) Jr/Sr/III/IV
Last Name First Name Maiden Name, if Applicable Middle Init.

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of

Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A

Business Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A

ATTORNEY FOR THIS PLAINTIFF: Bar # or Name: Pro Hac Vice (✓) Not an Attorney(✓)

Case: 30Cl1:22-cv-00110-KJ Document #: 1 Filed: 06/09/2022 Page 3 of 5

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPIJUDICIAL DISTRICT, CITY OFDocket No. _____
File Yr _____ Chronological No. _____ Clerk's Local ID _____Docket No. If Filed
Prior to 1/1/94 _____DEFENDANTS IN REFERENCED CAUSE - Page 1 of _____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant #2:

Individual: Ryder Last Name Brent First Name (_____) A Middle Init. Jr/Sr/III/IV Maiden Name, if Applicable

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: _____ Last Name _____ First Name (_____) _____ Middle Init. Jr/Sr/III/IV Maiden Name, if Applicable

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: _____ Last Name _____ First Name (_____) _____ Middle Init. Jr/Sr/III/IV Maiden Name, if Applicable

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

GULF SOUTH LAW FIRM, PLLC

**1423 24th Avenue, Suite A
Gulfport, Mississippi 39501
Phone: (228) 207-2880/Fax: (228) 206-2365**

**J. Heath Sullivan
Attorney in MS & LA
heath@gulfsouthlaw.com**

**Lauren R. Sullivan
Attorney in MS & LA
lauren@gulfsouthlaw.com**

June 8, 2022
FILED

Jackson County Circuit Clerk
P.O. Box 998
Pascagoula, MS 39568-0998

JUN 09 2022

RANDY CARNEY, CLERK

BY _____ D.C.

RE: *Kelia Deflanders and Carlos Mark Roberson v. Sun Coast Resources, Inc., et al.*
In the Circuit Court of Jackson County, Mississippi
New Circuit Court Filing
GSL File: 21-00354 & 21-00355

Dear Mr. Carney:

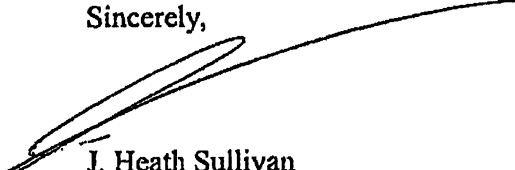
Enclosed please find the following:

- 1) Original and copy of the Complaint;
- 2) Original and one copy of each Summons to Defendant;
- 3) Civil Cover Sheet; and
- 4) Check for \$161.00 payable to the Jackson County Circuit Clerk.

Please file the Complaint and Summons and return the copies to me, stamped filed, in the enclosed envelope. Please also notify me by MEC.

Thank you for your attention to this matter.

Sincerely,



J. Heath Sullivan

Enclosures

CIRCUIT - CIVIL		HANDED <input type="checkbox"/>	
Case: 30CV11022-cv-00110-KU		Document # 1	Filed: 06/07/2022 Page 5 of 5
MAILED 41878			
Received Of <u>Gulf South Law Firm</u>			
Cause No. <u>22-110(2)</u>			
For: Clerk's Fees	\$85.00	Total	<u>161.00</u>
JSO Fund	\$40.00	Amount Paid \$	
Steno Tax	\$10.00	Check No.	<u>1800</u>
Jury Tax	\$3.00	For	<u>New Complaint</u>
Law Library	\$2.50		
SCEF	\$2.00		
Court Adm. Fund	\$2.00		
CECSF	\$10.00		
CLAF	\$5.00		
SCCF	\$0.50		
RM FEE	\$1.00		
Copy of Summons Return			
Other Advance Cost			
TOTAL	\$ <u>161.00</u>		

RANDY CARNEY
 CIRCUIT CLERK OF JACKSON COUNTY
 By [Signature]
 DEPUTY CIRCUIT CLERK

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

FILED

**KELIA DEFLANDERS AND
CARLOS MARK ROBERSON**

JUN 09 2022

PLAINTIFFS

RANDY GARNEY, CLERK

BY _____ D.C.

VERSUS

CAUSE NO. : 22-110 (2)

**SUN COAST RESOURCES, INC.,
BRENT ALAN RYDER,
AND JOHN DOES 1-10**

DEFENDANTS

COMPLAINT
(JURY TRIAL REQUESTED)

COMES NOW, Plaintiffs, **KELIA DEFLANDERS AND CARLOS MARK ROBERSON**, by and through their attorney, and file their Complaint against Defendants, **SUN COAST RESOURCES, INC, BRENT ALAN RYDER, AND JOHN DOES 1-10**, and show as follows:

PARTIES

1. Plaintiff, Kelia Deflanders, is an adult resident citizen of Jackson County, Mississippi.
2. Plaintiff, Carlos Mark Roberson, is an adult resident citizen of Jackson County, Mississippi.
3. Defendant, Sun Coast Resources, Inc. ("Sun Coast"), is a foreign corporation licensed to do business in the State of Mississippi. Sun Coast may be served through its registered agent for service of process, National Registered Agents, Inc., 645 Lakeland East Drive, Suite 101, Flowood, Mississippi 39232.
4. Defendant, Brent Alan Ryder, is an adult resident citizen of Texas based on information and belief. Ryder may be served at 5377 CR 2691, Buffalo, Texas 75831, via the Mississippi Secretary of State, or wherever he may be found.

5. Defendants, John Does 1-10, are persons or entities who are liable for the actions or inactions leading to the injuries sustained by Plaintiffs and whose identities are not yet known.

JURISDICTION AND VENUE

6. Jurisdiction and venue are proper in this Court as the transaction or occurrence which is the subject matter of this litigation took place in Moss Point, Jackson County, Mississippi.

STATEMENT OF FACTS

7. Plaintiffs incorporate all prior paragraphs as if copied in full.
8. On or about September 10, 2021, Plaintiff Deflanders was operating her 2013 Honda Accord in the westbound right lane of Shortcut Road in Moss Point, Mississippi. At all pertinent times, Plaintiff Roberson was a passenger.
9. At the same date and time, Defendant Ryder was operating a 2018 Ford fuel tanker truck in the westbound left lane of Shortcut Road.
10. As Plaintiff Deflanders was lawfully and carefully operating her vehicle in her lane of traffic, Defendant Ryder suddenly and without warning crossed Plaintiffs' lane of travel, causing a violent collision.
11. At all pertinent times and based on information and belief, Defendant Ryder was acting in the course and scope of his employment with Sun Coast, making Sun Coast vicariously liable.
12. Defendant Ryder's acts and omissions include, but are not limited to, the following:
- a. Failure to see what he should have seen;
 - b. Failure to stop or slow his vehicle in a reasonable manner;

- c. Failure to act as a reasonably prudent person would have under the circumstances;
- d. Failure to observe and avoid other traffic, specifically Plaintiffs' vehicle;
- e. Failure to be aware of his surroundings;
- f. Failure to operate his vehicle in an attentive manner; and
- g. Other negligent acts or omissions that may be shown at trial.

DAMAGES

13. Plaintiffs incorporate all prior paragraphs as if copied in full.
14. As a direct and proximate result of the Defendants' negligent acts and omissions, Plaintiffs each suffered the following damages, including but not limited to:
- a. Past and future medical expenses;
 - b. Past and future pain and suffering;
 - c. Loss of enjoyment of life;
 - d. Mental anguish, distress, and anxiety; and
 - e. Other special and general damages that may be proven at trial.
15. Plaintiffs' respective claims exceed \$75,000.00, exclusive of interest and costs.

JURY DEMAND

16. Plaintiffs incorporate all prior paragraphs as if copied in full.
17. Plaintiffs request a trial by jury on all issues.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs demand judgment with legal interest, expert witness fees, and court costs against the Defendants for a sum to be determined by a jury trial, all costs of these proceedings, and any other relief to which they may be entitled.

RESPECTFULLY SUBMITTED this, the 8 day of June, 2022.

KELIA DEFLANDERS AND
CARLOS MARK ROBERSON, Plaintiffs

BY:



J. HEATH SULLIVAN (MSB #105226)
Gulf South Law Firm, PLLC
1423 24th Avenue, Suite A
Gulfport, MS 39501
Phone: (228) 207-2880
Fax: (228) 206-2365
Email: lauren@gulfsouthlaw.com
Attorney for Plaintiffs

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

**KELIA DEFLANDERS AND
CARLOS MARK ROBERSON**

PLAINTIFFS

VERSUS

CAUSE NO. : 22-1102

**SUN COAST RESOURCES, INC.,
BRENT ALAN RYDER,
AND JOHN DOES 1-10**

DEFENDANTS

**SUMMONS
THE STATE OF MISSISSIPPI**

To: Brent Alan Ryder
5377 CR 2691
Buffalo, Texas 75831
Or wherever he may be found

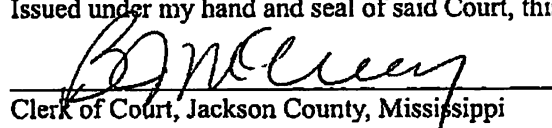
NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

YOU ARE REQUIRED TO MAIL OR HAND DELIVER A COPY OF A WRITTEN RESPONSE TO THE COMPLAINT TO J. HEATH SULLIVAN, THE ATTORNEY FOR THE PLAINTIFF(S), WHOSE MAILING ADDRESS AND STREET ADDRESS IS 1423 24TH AVENUE, SUITE A, GULFPORT, MISSISSIPPI 39501. YOUR RESPONSE MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT OR A JUDGMENT BY DEFAULT WILL BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT

YOU MUST ALSO FILE THE ORIGINAL OF YOUR RESPONSE WITH THE CLERK OF COURT WITHIN A REASONABLE TIME AFTERWARD.

Issued under my hand and seal of said Court, this 10 day of June, 2022.


Clerk of Court, Jackson County, Mississippi

Prepared by:
J. Heath Sullivan (MSB # 105226)
Gulf South Law Firm, PLLC
1423 24th Avenue, Suite A
Gulfport, MS 39501



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

**KELIA DEFLANDERS AND
CARLOS MARK ROBERSON**

PLAINTIFFS

VERSUS

CAUSE NO. : 22-110(2)

**SUN COAST RESOURCES, INC.,
BRENT ALAN RYDER,
AND JOHN DOES 1-10**

DEFENDANTS

**SUMMONS
THE STATE OF MISSISSIPPI**

To: Sun Coast Resources, Inc., through its registered agent for service of process
National Registered Agents, Inc.
645 Lakeland East Drive, Suite 101
Flowood, Mississippi 39232

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

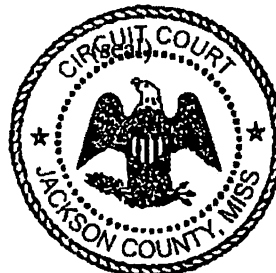
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YOU MUST ALSO FILE THE ORIGINAL OF YOUR RESPONSE WITH THE CLERK OF COURT WITHIN A REASONABLE TIME AFTERWARD.

Issued under my hand and seal of said Court, this 10 day of June, 2022.

B. J. McCreary, Jr.
Clerk of Court, Jackson County, Mississippi

Prepared by:
J. Heath Sullivan (MSB # 105226)
Gulf South Law Firm, PLLC
1423 24th Avenue, Suite A
Gulfport, MS 39501



Proof of Service
Sun Coast Resources, Inc.
Through its registered agent for service of Process,
CT Corporation System of Mississippi
645 Lakeland East Drive, Suite 101
Flowood, Mississippi 39232

(Name of person or entity served)

I, the undersigned process server, served the Summons and Complaint upon the person named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

X **PERSONAL SERVICE** I personally delivered copies to Matt Thibodeaux
13th of June 2022, where I found said person in Rankin County
of the State of Mississippi.

 I was not able to serve the Summons.

X At the time of service, I was at least 18 years of age and not a party to this action.

PROCESS SERVER:

NAME: Christeen Moffett
ADDRESS: 1132 Ridgewood Blvd Jackson, MS 39211
TELEPHONE NUMBER: 6013310047

STATE OF MISSISSIPPI

COUNTY OF Hinds

Personally appeared before me the undersigned authority in and for the state and county aforesaid the within named Christeen Moffett who being first by me duly sworn states on oath that the matters and facts in the foregoing the Summons and Complaint proof of Service are true and correct as therein stated.

Sworn to and subscribed before me, this the 15 day of June, 2022

Christeen Moffett
Process Server

Jason McMILLAN
Notary Public



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

**KELIA DEFLANDERS AND
CARLOS MARK ROBERSON**

PLAINTIFFS

VERSUS

CAUSE NO. : 22-110(2)

**SUN COAST RESOURCES, INC.,
BRENT ALAN RYDER,
AND JOHN DOES 1-10**

DEFENDANTS

**SUMMONS
THE STATE OF MISSISSIPPI**

To: Sun Coast Resources, Inc., through its registered agent for service of process
National Registered Agents, Inc.
645 Lakeland East Drive, Suite 101
Flowood, Mississippi 39232

NOTICE TO DEFENDANT

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MISSISSIPPI 39501. YOUR RESPONSE MUST BE MAILED OR DELIVERED WITHIN THIRTY
(30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT OR A
JUDGMENT BY DEFAULT WILL BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER
THINGS DEMANDED IN THE COMPLAINT**

**YOU MUST ALSO FILE THE ORIGINAL OF YOUR RESPONSE WITH THE CLERK OF COURT
WITHIN A REASONABLE TIME AFTERWARD.**

Issued under my hand and seal of said Court, this 10 day of June, 2022.

B. J. McCreary, Jr.
Clerk of Court, Jackson County, Mississippi

Prepared by:
J. Heath Sullivan (MSB # 105226)
Gulf South Law Firm, PLLC
1423 24th Avenue, Suite A
Gulfport, MS 39501

